

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA,

Plaintiff,

**Docket No.: 18-CV-9293-BRM-TJB**

-against-

THE REAL PROPERTIES KNOWN AS

50 RIVERSIDE BOULEVARD, UNIT 21B  
NEW YORK, NEW YORK ;

2 RIVER TERRACE, UNIT 12J  
NEW YORK, NEW YORK;

**NOTICE OF MOTION**

40 BROAD STREET, UNIT 20FG  
NEW YORK, NEW YORK ; and

18 AND 19 COLTS GAIT LANE  
COLTS NECK, NEW JERSEY

Defendants *in rem*.

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PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law, the Petitioners, Paul Parmar, 21B One River Park, LLC, 2 River Terrace Apartment 12J, LLC, and Dioskouroi Kastor Polydeuces, LLC, shall move the Court, at a time and date to be set by the Court, for an order:

1. Pursuant to Fed.R.Civ.P. 12(b)(6), dismissing the Complaint for failure to state a cause of action;

2. Sanctioning Plaintiff for their knowing use of unlawfully obtained stored electronic communications and communications protected by the attorney-client privilege by dismissing the case, precluding any use of the stolen emails, and disqualification of counsel; and
3. Such other and further relief as the Court deems appropriate.

Respectfully submitted,



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